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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT

DEPUTY

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDGARDO CARLOS VILAS

Defendant.

MAGISTRATE CASE NO. **'08 MJ 0084**

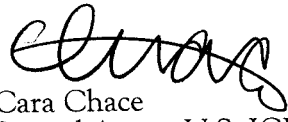
COMPLAINT FOR VIOLATION OF:

Title 18 U.S.C. § 2252(a)(4)(B) -  
Possession of Child Pornography

The undersigned Complainant, being duly sworn, states:

On or about January 11, 2008, within the Southern District of California, defendant EDGARDO CARLOS VILAS, did knowingly possess one or more matters, that is computer media containing visual images, including files "youngfuck3.jpg" and "youngwhore4.jpg", that had been mailed, shipped and transported in interstate and foreign commerce, and which were produced using materials which have been mailed, shipped and transported in interstate and foreign commerce, by any means including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and which visual depictions were of such conduct; in violation of Title 18, United States Code, Section 2252(a)(4)(B).

And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Cara Chace  
Special Agent, U.S. ICE

Sworn to me and subscribed in my presence this 11 day of January 2008.

  
UNITED STATES MAGISTRATE JUDGE

1  
2  
3                   **STATEMENT OF FACTS**

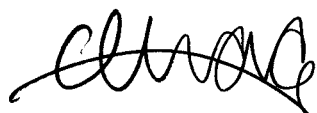
4           I am a Special Agent with the U.S. Immigration and Customs Enforcement (ICE) having been so  
5 employed for approximately five years. I am currently assigned to the Cyber-crimes group within the ICE  
6 Office of Investigations, Cybercrimes division in San Diego, California. Prior to this time, I interned for  
7 18 months with the former U.S. Customs Service. I have received training from the Federal Law  
8 Enforcement Training Center and other law enforcement agencies in the area of child pornography  
9 investigations and pedophile behavior. I have assisted, or been the affiant, in the service of over 35 search  
10 warrants involving computer/cyber crimes. I received basic training from ICE regarding cyber-crime  
11 investigations. I am currently assigned to the Internet Crimes Against Children (ICAC) Task Force in San  
12 Diego, CA. This task force includes members of the San Diego Police Department, San Diego Sheriff's  
13 Department, U.S. Postal Inspection Service, Federal Bureau of Investigation, Naval Criminal Investigative  
14 Service, U.S. Attorney's Office and the San Diego District Attorney's Office. This complaint is based on  
15 my own investigation as well as information received from fellow ICE Agents and other law enforcement  
16 officers.

17           In April 2006, Immigration and Customs Enforcement (ICE, Cyber Crimes Center (C3)), Child  
18 Exploitation Section (CES) initiated an investigation into a criminal organization operating/controlling  
19 numerous commercial child exploitation websites. The investigation began with the identification of the  
20 commercial child exploitation website known as "Home Collection." The investigation has revealed that  
21 the same criminal organization is operating in excess of 200 different commercial child exploitation  
22 websites. In addition, the organization utilizes various PayPal accounts to process the payments for access  
23 to the member-restricted websites.

24           In or about November 2007, I learned from other ICE Agents that the person controlling email  
25 account evilas1391@hughes.net had paid money through PayPal to subscribe to the illegal CP website that  
26 allowed him (and others) to access, download and distribute thousands of images of child pornography.  
27 The person controlling evilas1391@hughes.net submitted his name as to PayPal as Edgardo Vilas, and gave  
28 a residence of PO Box 685/9426 Oak Grove Drive, Descanso, CA 91916.

1 On January 11, 2008, ICE agents executed a federal search warrant at Vilas' residence and located  
2 loose media, including cd's and dvd's containing still images and videos of child pornography. One such  
3 image, file name "youngfuck3.jpg" depicts a naked female child from the waist down, who appears to be  
4 approximately six years old. The focus of the photograph is the girl's vagina. There is text across the  
5 photograph, which states, "Fresh Pussy!". A second image, file name "youngwhore4.jpg" depicts a naked  
6 prepubescent female lying on her left side with her legs spread apart, exposing her genitalia. The focus of  
7 the photograph is on her vagina. The following text is written across the photograph: "Drill Her Tight  
8 Pussy! Slippery When Wet!". "Enter Here!" is written directly below her exposed vagina. Both images  
9 were found on a dvd located in a dresser drawer in the master bedroom.

10 After having been advised of his Miranda rights, and knowingly waiving his rights, Vilas  
11 acknowledged possession of the dvd containing child pornography seized by the agents as material that he  
12 had previously copied from his home computer. These images have been copied and are available for the  
13 Court's review. Vilas also admitted to purchasing child pornography consistently over the past ten years.  
14 Vilas stated he is a teacher at Rancho Del Campo, Juvenile Court and Community Schools, but denied  
15 ever sexually molesting any of his students.



Cara Chace  
Special Agent, U.S. ICE